

Q1 In terms of setting design standards for the processing of children's personal data by providers of ISS (online services), how appropriate you consider the above age brackets would be:

- ☐ Not at all appropriate
- ☒ **Not really appropriate**
- ☐ Quite appropriate
- ☐ Very appropriate

Q1A Please provide any views or evidence you have on how appropriate you consider the above age brackets would be of setting design standards for the processing of children's personal data by providers of ISS (online services).

**It may be more appropriate to match the brackets to stages in compulsory education**  
**Please see attachment R11 Q5n 0000000417.docx**

Q2 Please provide any views or evidence about children's development needs in an online context for each, or any of the above age brackets.

**Please see above**

Q3 Please provide any views or evidence you have on how the Convention might apply in the context of setting design standards for the processing of children's personal data by providers of ISS (online services).

Q4 Please provide any views or evidence you have on what you think the Information Commissioner should take into account when explaining the meaning and coverage of these terms in the Code?

age appropriate definitions of each will be required

Q5 Please provide any views or evidence you have on the following:

Q5A the opportunities and challenges you think might arise in setting design standards for the processing of children's personal data by providers of ISS (online services), in each or any of the above areas.

**this will be different to those providing ISS directly to children as opposed to those providing via schools**

Q5B how the ICO, working with relevant stakeholders, might use the opportunities presented and positively address any challenges you have identified.

**Will require clarification of the purpose of the ISS**

Q5C what design standards might be appropriate (ie. where the bar should be set) in each or any of the above areas and for each or any of the proposed age brackets.

**Please see attachment R11 Q5i 0000000417**

Q5D examples of ISS design you consider to be good practice.

Q5E additional areas (not included in the list above) which you think should be the subject of a design standard.

Q6 Name

[REDACTED]

Q6a Email

[REDACTED]@neweraed.co.uk

Q6b Brief summary of what you think you could offer

**insight from an education technology company that is involved in teaching digital citizenship**

Q7 Please provide any other views or evidence you have that you consider to be relevant to this call for evidence.

Q8 Are you (select one):

A body representing the views or interests of children?

A body representing the views or interests of parents?

A child development expert?

**A provider of ISS likely to be accessed by children?**

**New Era Education - providers of DB Primary VLE**

A trade association representing ISS providers?

An ICO employee